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May 18, 2020

BY ECF

Honorable Kimba M. Wood
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Wesam El-Hanafi*
10 Cr. 162 (KMW)

Dear Judge Wood:

I write to provide the Court with an update.

On May 13, when the government submitted its opposition, there were 17 inmates with current positive COVID-19 tests at Butner Low, where Mr. El-Hanafi resides. On May 15, when I submitted my reply, that number had increased to 23. Today, the BOP website lists 30 current positives, an increase of almost 50 percent in five days¹.

We have reason to believe that three of these new positives come directly from Mr. El-Hanafi's unit; yesterday, two more inmates from the Granville unit were removed from the unit to the medical SHU. Today, a third inmate from Granville was taken to the medical SHU.

Given my client's vulnerability to severe illness as a result of his multiple and complex medical issues, the rapid and continuing spread of COVID-19 throughout Butner Low, and the impossibility of social distancing, Mr. El-Hanafi fears for his life.

Thank you for your kind consideration of this letter.

Respectfully yours,



Sarah Kunstler
Attorney for Wesam El-Hanafi

¹ Available at <https://www.bop.gov/coronavirus/>